## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case: 2:21-cr-20572 Judge: Hood, Denise Page

MJ: Grand, David R.

Filed: 09-09-2021 At 03:27 PM INDI USA VS GAYLES (DP)

-vs-

D-1 DAMIEN GAYLES,

Defendant.

### INDICTMENT

THE GRAND JURY CHARGES:

#### **COUNT ONE**

18 U.S.C. § 922(g)(1) - Felon in possession of a firearm

#### D-1 DAMIEN GAYLES

That on or about August 17, 2021, in the Eastern District of Michigan, Southern Division, the defendant, DAMIEN GAYLES, knowing that he had been convicted of a crime punishable by a term of imprisonment exceeding one year, a felony offense, did knowingly and unlawfully possess a firearm, to-wit: one Taurus, GC2, 9 mm pistol which was manufactured outside the State of Michigan and thus traveled in interstate or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

# FORFEITURE ALLEGATIONS 18 U.S.C. § 924(d) and 28 U.S.C. § 2461

The above allegations contained in this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), together with Title 28, United States Code, Section 2461(c). Upon conviction of the offense(s) alleged in this Indictment, Defendant DAMIEN GAYLES shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of the offense(s), including, but not limited to a Taurus, GC2, 9 mm pistol and ammunition, pursuant to Title 18,

United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN Acting United States Attorney

s/Benjamin C. Coats
BENJAMIN C. COATS
Chief, Major Crimes Unit
Assistant United States Attorney

## s/Jeanine Brunson

JEANINE BRUNSON Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226-3211 (313) 226-9597 jeanine.brunson@usdoj.gov

Dated: September 9, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover	Sheet Case Num	ber
NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.			
Companion Case Informatio	n Com	oanion Case Number:	
This may be a companion case based upo	on LCrR 57.10 (b)(4) <sup>1</sup> : Judg	e Assigned:	
☐ Yes ⊠ No	AUS	A's Initials:	
Case Title: USA v. DAMIEN	I GAYLES		
County where offense occurred : Wayne			
Check One: ⊠Felony	□Misdeme	anor	□Petty
Indictment/Information no prior complaintIndictment/Information based upon prior complaint [Case number: 21-mj-30423 ]Indictment/Information based upon LCrR 57.10 (d) [Complete Superseding section below].			
Superseding Case Information			
Superseding to Case No: Judge:			
<ul> <li>☐ Corrects errors; no additional charges or defendants.</li> <li>☐ Involves, for plea purposes, different charges or adds counts.</li> <li>☐ Embraces same subject matter but adds the additional defendants or charges below:</li> </ul>			
Defendant name	Charges	Prior Con	nplaint (if applicable)
Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.			
September 9, 2021	Gennine	Brunson	
Date	Jeanine Brunso Assistant United 3 211 W. Fort Stre Detroit, MI 4823 Phone: (313) 22 Fax: (313) 22 E-Mail address: Attorney Bar #:	States Attorney eet, Suite 2001 26-3277 3-9597 3-2372 jeanine.brunson@us	doj.gov

<sup>&</sup>lt;sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.